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U.S. DISTRICT COURT  
MIDDLE DIST. OF GEORGIA  
MACON, GEORGIA

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
QUESTIONNAIRE FOR THE PRISONERS PROCEEDING  
PRO SE UNDER 42 U.S.C. § 1983

SANFORD HILL, JR., PRO SE  
#57997018

(GIVE FULL NAME AND PRISON NUMBER OF PLAINTIFF)

Plaintiff

VS.  
THE GEO GROUP INC  
DONALD RACKLEY, WARDEN  
JOHN DOE SYED, Physician

(NAME OF EACH DEFENDANT)

Defendant(s)

CIVIL ACTION NO:

5 : 13-CV-398

I. GENERAL INFORMATION

1. Your full name and prison number Sanford Hill, Jr., #57997018
2. Name and location of prison where you are now confined DRJDF Folkston GA 31537
3. Sentence you are now serving (how long?) Five months

(a) What were you convicted of? Forgery Checks

(b) Name and location of court which imposed sentence Middle Dist. of Fla  
Jacksonville Florida 32202, Federal Court

(c) When was sentence imposed? September 20, 2013

(d) Did you appeal your sentence and/or conviction? Yes  No

(e) What was the result of your appeal? N/A

(f) Approximate date your sentence will be completed January 2014

## II. PREVIOUS LAWSUITS

NOTE: FAILURE TO DISCLOSE ALL PRIOR CIVIL CASES MAY RESULT IN THE DISMISSAL OF THIS CASE. IF YOU ARE UNSURE OF ANY PRIOR CASES YOU HAVE FILED, THAT FACT MUST BE DISCLOSED AS WELL.

4. Other than an appeal of your conviction or sentence, and other than any habeas action, have you filed a lawsuit dealing with the same or similar facts or issues that are involved in this action?

Yes  No

5. If your answer to question 4 is "Yes," list that lawsuit below, giving the following information:

(IF YOU HAVE FILED MORE THAN ONE LAWSUIT, LIST OTHER LAWSUITS ON A SEPARATE SHEET OF PAPER, GIVING THE SAME INFORMATION FOR EACH)

(a) Parties to the previous lawsuit INVOLVING SAME FACTS:

Plaintiff(s): \_\_\_\_\_

Defendant(s): \_\_\_\_\_

(b) Name of Court: \_\_\_\_\_

(c) Docket Number: \_\_\_\_\_ When did you file this lawsuit? \_\_\_\_\_

(d) Name of judge assigned to case: \_\_\_\_\_

(e) Is this case still pending? Yes  No

(f) If your answer to (e) is "No", when was it disposed of and what were the results?

(DID YOU WIN? WAS THE CASE DISMISSED? DID YOU APPEAL?)

6. Other than an appeal of your conviction or sentence, and other than any habeas action, have you ever filed any lawsuit while incarcerated or detained? Yes  No

7. If your answer to question 6 is "Yes," list that lawsuit below, giving the following information:

(IF YOU HAVE FILED MORE THAN ONE LAWSUIT, LIST OTHER LAWSUITS ON A SEPARATE SHEET OF PAPER, GIVING THE SAME INFORMATION FOR EACH)

(a) Parties to the previous lawsuit:

Plaintiff(s): SANFORD HILL JR Pro se

Defendant(s): John Rutherford Sheriff, Co. STAFFORD,

(b) Name of Court: U.S. District Middle District Florida (Jacksonville)

(c) Docket Number: 3:13-cv-00319 When did you file this lawsuit? March 26, 2013

(d) Name of judge assigned to case: Joel B. Toomey

(e) Is this case still pending? Yes  No

(f) If your answer to (e) is "No", when was it disposed of and what were the results?  
(DID YOU WIN? WAS THE CASE DISMISSED? DID YOU APPEAL?)

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8. AS TO ANY LAWSUIT FILED IN ANY FEDERAL COURT in which you were permitted to proceed *in forma pauperis*, was any suit dismissed on the ground that it was frivolous, malicious, or failed to state a claim? Yes  No

If your answer is Yes, state the name of the court and docket number as to each case:

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### III. PLACE OF INCIDENT COMPLAINED ABOUT

9. Where did the matters you complain about in this lawsuit take place? D. Ray James  
Detention Facility in Folkston GA

(a) Does this institution have a grievance procedure? Yes  No

(b) If your answer to question 9(a) is "Yes", answer the following:

(1) Did you present your complaint(s) herein to the institution as a grievance?

Yes  No

(2) If Yes, what was the result? They never resolve the issue  
nor respond to my grievances, AND I filed  
grievance Appeal still no response date  
all the way back to June 2013.

(3) If No, explain why not:

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(c) What, if anything else, did you do or attempt to do to bring your complaint(s) to the attention of prison officials? Give dates and places and the names of persons talked to.

After I slipped down, I sign up for sick call, AND seen the Institutional warden Mr. Donald Rackley, I informed him a few day after September 24, 2013, what happened he told me that I would be looking in to!

(d) Did you appeal any denial of your grievance to the highest level possible in the prison system? Yes  No

(1) If Yes, to whom did you appeal and what was the result? IAppealed my complaint to the grievance Coordinator explaining that I never received a response and still havent!

(2) If No, explain why you did not appeal: I have appeal over and over they never redbered a answer or response,

10. In what other institutions have been confined? Give dates of entry and exit.

Duval County Jail from July 7, 2012 to January 24, 2013 the Lawsuit I filed is dealing with two co-officers twisting my left arm causing severe injuries to my left shoulder that the case pending now.  
In the U.S. District Court Middle District of Florida

#### IV. PARTIES TO THIS LAWSUIT

11. List your CURRENT place of incarceration/mailing address.

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12. List the full name, the official position, and the place of employment of each defendant in this lawsuit. (ATTACH ADDITIONAL PAGES IF NECESSARY)

THE GEO GROUP INC.

D-Ray James Detention Facility

Defendant, DONALD RACKLEY; WARDEN:

DEFENDANT, PHYSICIAN, JOHN DOE SYED;

P.O. Box 2005, Folkston Ga 31537

V. STATEMENT OF CLAIM

13. In the space hereafter provided, and on separate sheets of paper if necessary, set forth your claims and contentions against the defendant(s) you have named herein. Tell the court WHAT you contend happened to you, WHEN the incident(s) you complain about occurred, WHERE the incident(s) took place, HOW your constitutional rights were violated, and WHO violated them? Describe how each defendant was involved, including the names of other persons who were also involved. If you have more than one claim, number and set forth each claim **SEPARATELY**.

**DO NOT GIVE ANY LEGAL ARGUMENT OR CIT ANY CASES OR STATUTES AT THIS TIME;** if such is needed at a later time, the court will advise you of this and will afford you sufficient time to make such arguments. **KEEP IN MIND THAT RULES 8 OF THE FEDERAL RULES OF CIVIL PROCEDURE REQUIRES THAT PLEADINGS BE SIMPLE, CONCISE, and DIRECT!** If the court needs additional information from you, you will be notified.

WHERE did the incident you are complaining about occur? That is, at what institution or institutions? D-Ray James Detention Facility

WHEN do you allege this incident took place? June 4, 2013 September 21, 24, 2013

WHAT happened? On or about June 4, 2013, Approximately

10:30 pm, I was exiting a shower in pod 3, and slipped down because of the water outside of the shower without shower mats, I reinjured my left shoulder and lower lumbar spine pain immediately radiated from my left shoulder, arm, hand and lower back, hips, buttock, legs and feet, I informed the

(1) the guard of the incident and requested to be seen by the medical Department, the medical/nurse wrote down my complaints and said, I would be seen by a Physician, I seen a Doctor approximately a few weeks latter and he ordered X-Rays.

I continued sick called requesting referral to the Physician because I continued experiencing severe acute pain that radiating from my left shoulder, arm, hand and fingers AND Lower lumbar spine, I was told by the Physician that my X-Rays of my lower back and left shoulder were negative and he was not going to referral for further testing

(2) I filed informal grievance regarding the incident on or about June 5, 2013, I never received a response to my grievances.

(3) I was latter released July 2, 2013, to the halfway house, under two years of probation I violated my probation and returned back to D. Ray James Detention facility August 15, 2013.

(4) I put in for sick call August 18, 2013, I informed the nurse that I slipped down June 8, 2013, and I still experiencing severe pain and discomfort regarding my left shoulder and my lower back. I asked for result of my X-Rays, and to renew my Neurontin 400 mg for pain.

(5) I was called out for sick call August 19, 2013 the nurse told me that they had a new physician and they stop giving the "Neurontin medication".

I informed the nurse that I take my meds Neurontin 400mg for pain and nerve damage spasms the nurse informed me that the new physician would not give me my Neurontin 400 mg nor referral me for MRI Cat scan X-Ray and follow up with a qualified specialist.

(6) I signed up for sick called on 9-10-2013 and complain about constant continual pain that radiating through my left shoulder and my lower back spinal cord radiating acute severe pain, and I had slipped down in the dormitory pod & I tried to brake my fall with my right hand and upon doing so I injured my right hand around my pinkie finger area, I informed the nurse at sick called I was never given X-Rays.

(7) I filed a informal/grievance regarding the incident that I reported to sick call but no one recommend any X-Rays as a result I continue to suffer pain and discomfort to my little pinkie finger right hand!

I never received a response regarding the grievance about slipping and injuring my pinkie finger right hand I forward the complaint to the next level which is a appeal to the grievance coordinator still no response all my grievances are medical emergency grievances!

(9) On September 21, 2013, at approximately 12:35pm slipped down in front of the shower area I reinjured my left shoulder and the pain was radiating from my neck, shoulder, arm and hand, I also reinjured my lower Lumbar spine at the time I was experiencing acute pain radiating through my spinal cord, buttock, hips, legs and feet. I was experiencing pain coming from my right hand as well!

(10) I was taken to medical Department there a nurse, no recommend that I be taken to the hospital/for X-Rays, I was sent back to my dormitory in severe pain.

(11) I filed informal grievances of medical nature emergency I still have not received a response.

(12) On September 24, 2013, at approximately 10:45 AM I was walking near the shower area and I slipped down and seriously injured my Lower back, left shoulder, and right pinkie finger possible a hair line fracture to my hand I was taken to medical and medical did nothing.

(13) I returned to my dormitory Approx 11:30 AM, in severe excruciating pain and discomfort the nurse told me you already has morphine, and said they was going to put me in to see the doctor I told them that I need immediate emergency care.

(14) I seen the Warden latter that day he came inside our Pod "2" I told him what had happend to me starting all the way back to slipping in June 4, 2013 to the present incidents and the medical keep saying they were going to put me in to see the Physician, I haven't had any X-Rays Nor followed up by a qualified Physician.

(15) Warden Mr. Rackley said He would go to medical and ask why haven't anyone referral me to be evaluated by a Physician.

(16) On September, 24, 2013, approximately 3:00 pm I was called out by medical department and seen by Physician Mr. SYED, the onlything Mr. SYED did was increase my Motrin 400 mg to 600 mg and said he was not going to recommend any X-Rays on my lower back, left shoulder or Right hand, he said he did not care about Civil Court.

(17) I filed grievances regarding Physician Dr. SYED, refuse to order x-ray for my lower Lumbar spine and right hand when I tried to catch myself while falling I also injured my fingers.

(18) The x-rays of my left shoulder will say that the find were unremarkable I continue to experiencing excruciating pain that radiating through my left side of my neck into my left shoulder down into my left arm!

(19) I got copies of the last emergency grievances I filed at D-Ray James Detention facility the Plaintiff attaching copies of the grievances filed after the fact that D-Ray James detention facility refused to respond to prior grievances so the Plaintiff refiled grievances kept one copy of each grievance.

Exhibit "A" dealing with shower mats outside the shower.

Exhibit "B" failure to x-ray diagnosis my right pinkie finger and right hand for possible fracture possible break!

Exhibit "C" D. Ray James Detention facility refused to have X-Rays and respond to my Emergency grievance of lower back injuries.

Exhibit "d" D. Ray James Detention facility failure to respond to Plaintiff emergency grievance and x-rays to Plaintiff left Shoulder, arm.

Exhibit (e) D. Ray James Detention facility failure to provide a response to Plaintiff emergency situation and order x-Ray of Plaintiff injuries when he slipped down once again September 24, 2013 after speaking with warden still they never x-rayed Plaintiff's lower back, left shoulder, right hand and right knee.

Exhibit "f" Plaintiff on or about October 3, 2013, filed a grievance outlining the fact that he filed several grievances that had not been responded to and the Plaintiff has a Constitutional right to have his grievance responded to timely without delay because they were checked a medical Emergency grievances!

Respectfully submitted  
Sanford Hill Jr.

## STATEMENT OF CLAIM

Plaintiff State under the United State Constitution Eighth Amendment And the Fourteenth Amendment,

Defendants violated Plaintiff SANFORD HILL, JR., right by not providing Plaintiff with adequate Medical care showed deliberate indifference to My Serious Medical Needs denying me immediate medical attention.

I'm suffering continual excruciating pain and discomfort to my lower lumbar spine with Severe pain that radiates through my spinal cord, buttock, hips, pain in my groins, bladder pain when urinating, pain radiates through my legs and feet!

Plaintiff states that he suffering continual shoulder pain in the left shoulder, neck area as well as his arm and hand!

Plaintiff also state due to the fact trying to catch himself while falling he injured his right hand and pinkie finger which causing continual pain and discomfort.

All the above that's stated herein violated Plaintiff Constitutional Rights of the Eighth And Fourteenth.

14. List the name and address of every person you believe was a WITNESS to the incident(s) you complain about, BRIEFLY stating what you believe each person knows from having seen or heard what happened. (USE ADDITIONAL SHEETS, IF NECESSARY)

Heotis D. Williams # 57981018 D-Ray James Detention Facility P.o.Box 2005  
Earnest Brown # 58686018 "EARNEST BROWN," DRJDF P.o.Box 2005  
Donovan Townsell # 58652018 "DONOVAN TOWNSELL," DRJDF P.o.Box 2005  
Tyrion Smith # 58033018 "Tyrion Smith" DRJDF P.o.Box 2005  
Folkston GA 31537 They would say they seen the incident

15. BRIEFLY state exactly what you want the court to do for you. That is, what kind of relief are you seeking in this lawsuit? Do not make any legal arguments and do not cite any cases or statutes! (USE ADDITIONAL SHEETS, IF NECESSARY)

I am requesting the Court to subpoena the videotape of the incidents of people in the past has slipped down because of waxed floors and order them to stop waxing the floors and use shower mats.

Each Named Defendant Compensated me for pain and suffering that I endure in the express amount of \$300,000.00 Three hundred thousand dollars, and pay for all Medical Hospital bills expense.

16. You may attach additional pages if you wish to make any legal argument. However, legal arguments are NOT required in order for you to obtain relief under §1983. If the court desires legal argument from you, it will request it. If any defendant presents a legal argument, you will be afforded an opportunity to respond thereto.

17. KEEP IN MIND THAT ONCE YOUR LAWSUIT IS FILED, THE COURT WILL REQUIRE YOU TO DILIGENTLY PROSECUTE IT. That means that you will be required to go forward with your case without delay. Thus, if you fail to adequately prepare your case before you file it, you may find your lawsuit dismissed for failure to prosecute if you take no action once it is filed. YOU WILL RECEIVE NO FURTHER INSTRUCTIONS FROM THE COURT TELLING YOU WHAT TO DO OR HOW TO DO IT! IT IS YOUR RESPONSIBILITY AND YOURS ALONE TO PROSECUTE YOUR OWN CASE! If you fail to prosecute your case, it will be dismissed under Rule 41 of the Federal Rules of Civil Procedure.

Signed this 9th day of October, 2013.

Sanford Hill, Jr.,  
PLAINTIFF